

United States District Court for the  
Northern District of Ohio (Eastern)

Kenneth Lindsey  
Plaintiff

CASE No.

v.

4:23CV02250

Judge

County of Mahoning

Comes now Pro Se Plaintiff  
Kenneth Lindsey to redress the deprivation of rights  
under Color of Law Pursuant to 42 USC 1983  
Whereas the Court has jurisdiction under 28 USC 1331  
Whereas this Petitioner has exhausted Administrative  
remedies to no avail. This Petitioner's claim for  
injunctive relief is authorized by 28 USC 2283 and  
2284 as well as Rule 65 FRCP whereas Petitioner  
moves to sue defendants individually and in their  
official capacities.

Wherefore, Plaintiff respectfully prays  
that this Court enter judgement Granting this Petitioner  
injunction and Request a jury trial Seeking  
money damages in the amount of \$1.2 Million  
dollars against each defendant, jointly and  
severally and any additional relief this Court  
deems just and proper.

1. Duties of Defendants who so named in the complaint,, in violations of statutory and regulations, civil rights as well as but not limited to fiduciary obligations as well as obstructing of the exercise of Religious freedoms.

A. The County of Mahoning is empowered by the Laws of the State of Ohio to operate the Mahoning County Justice Center and required to collect and expend revenue to do so according to strict regulations.

B. Mahoning County Commissioners on behalf of Mahoning County are responsible of funding the operations of the Mahoning Co. Justice Center, overseeing the agency to ensure compliance with such statutes and regulations, as well as task with oversight of others or drafting of relevant policy.

C. The Mahoning County Sheriff is charged with the duty of operating the Mahoning Co. Justice Center as chief law enforcement officer, responsible for the enforcement of State and local laws. The Sheriff is also charged with maintaining the Mahoning County Justice Center.

The violations listed in this complaint consist of the following in no specific order:

1. The Sheriff has denied me visits from my family without any reason or at least without informing me as to what reason would I be denied this Right. Obviously if it was a Privilege that I could lose then I would have had to have done something to have lost my Privilege; the issue is I've never had a disciplinary incident report since I've been in this facility

2. The food is served cold

3. There is no fruit on the trays.

4. The facility only offers religious service to Christian faith based inmates.

5. The facility has roaches.

6. We are locked down all day because the facility has a shortage of staff.

7. The facility has a high rate of inmate on inmate fights and I don't feel safe.

8. A staff member was raped here and I have not been able to sleep right ever since the incident because I was subjected to this condition of confinement.

9. The facility charges Federal inmates for phone calls when Federal inmates are supposed to receive calls for free.

10. Only Christian inmates are allowed to receive books.

11. The facility is receiving Federal funding to feed Federal inmates under Federal Guidelines but instead we all receive State trays.

12. The facility does not allow inmates in the hde to wash our clothes.

13. The facility does not clean the Showers everyday and our toilets are constantly inoperable full with waste and sometimes they are in this condition for hours.

14. Our meals are usually served cold and the trays are unclean.

15. We are locked down all day for our half the day and I have not been classified because I am a pretrial detainee So I should not be locked down all day simply because the facility can not maintain employees.

16. Our mattresses are old and unclean

17. The facilities do not have enough chairs in the Dorms to provide for all the inmates to sit.

18. The facility offers no Law Library or Library of Law they only offer a Device that they charge us to use and it rarely works proper and they take it like its a Privilege not a Right.

19.

The facility will restrict our access to the courts, by not allowing us to receive our legal mail and not allowing us to effectuate filings with access to send out certified mail.

20. This Petitioner has been in the facility for 7 months and has never been allowed to go outside to Rec.

21. This Petitioner has been in the facility 7 months and has never been to medical for a check up or any other reason even after multiple request to staff.

23 This Petitioner has been denied medical, had blood in my stool, vomit, and lost a lot of weight.

The defendants mention and listed here are being sued in there Public and Private capacity, / official working capacity and personal capacity, individually, jointly and severally and this Petitioner is requesting a jury trial.

The Defendants included herein are.

Sheriff Jerry Greene  
Warden Cappibianca  
Assistant warden Lt. Diangelo  
Administrator Kountz  
Commissioner D. Ditzler  
Commissioner C. Rimedio  
Commissioner A. Traficanti  
The County of Mahoning.

I Swear the foregoing is true and correct to the best of my knowledge.

Regarding the fact that the defendants have knowledge of these ongoing issues creates a careless breach of duty and based on the defendants assets in part, in order to account for the significance in the punitive assesment of this suit and requesting nominal value as well to the amount of 1 million 2 hundred thousand in total (1.2 million.) \$200,000 in punitive. I declare under penalty of perjury the foregoing is true and correct  
Kenneth diding